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Before The
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In The Matter of)

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CC Docket 92-77

Billed Party Preference)

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for 0+ InterLATA Calls)

**RESPONSIVE COMMENTS OF
COMMUNICATION TELESYSTEMS INTERNATIONAL**

Communication Telesystems International ("CTS"), by its attorneys, herewith files its responsive comments in the captioned proceeding.

CTS did not file initial comments, but herewith states for the record that it supports those comments submitted by the America's Carriers Telecommunications Association ("ACTA"). In its initial comments ACTA outlined the numerous and often contradictory facts, opinion, studies and reports which had been submitted in the first series of comments and replies over two years earlier. ACTA observed that given the patent inconclusiveness of the record then developed, the Commission could not have justified, based on that record, adoption of BPP as furthering the public interest. In finding it necessary to release the current Further Notice of Proposed Rulemaking ("FNPR") in order to update the record, the Commission itself revealed its own recognition of the problems created by the state of the previous record in this docket.

Given the conflicting views, opinions, facts and estimates contained from the first round of comments and replies, ACTA argued in its comments that any decision by the FCC to adopt certain tentative conclusions supporting implementation of BPP that is based on the "consumer" dividends derived from the earlier record (despite its conflicting nature), was not justified.

In addition, CTS wishes to go on record as supporting the substance of the initial comments of such companies as MFS Communications Co., Inc., Teleport Communications

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Group, Inc., U.S. Long Distance, Inc., LDDS Communications, Inc., the trade associations like the American Public Communications Council, and additionally, the several OSPs which submitted initial comments in response to the FNPR.

CTS submits that BPP is a policy without portfolio, an idea whose efficacy cannot adequately be analyzed, much less fostered as official telecommunications policy. CTS' position has been further solidified by the Reply Comments which were prepared by and on behalf of ACTA, and wishes the record to reflect CTS' support for those reply comments.

Finally, CTS agrees with the proposed alternative approaches for Commission consideration of these issues which ACTA submits in its reply comments. Specifically, the Commission should refuse to pursue BPP and instead -

- * Revisit and adopt fairer and competitively more just calling card validation procedures and requirements;
- * Investigate how its enforcement of the tools Congress has already provided in the complaint process of the Communications Act, as bolstered by TOCSIA, could be stepped up and improved to address and cure any specific instances of excessive practices;
- * Expand programs for consumer awareness and work with industry representatives, like ACTA, to adopt codes of conduct for their memberships;
- * Concentrate resources on improving the infrastructure and eliminating artificial barriers to more effective competition by which consumers will truly obtain more responsive services at reasonable costs;
- * Eschew the temptation to announce a supposed "telecommunications consumer dividend" at the expense of ignoring the serious dislocations that will be caused to all

telecommunications users by having eliminated, as a result of adopting a policy like BPP, the small businesses seeking to serve all users;

* Analyze BPP under the Regulatory Flexibility Act for BPP's impact on the small independent telcos, small OSPs, and other small businesses affected.

BPP continues to be a solution looking for a problem. Sound policy cannot be fashioned in such an environment. Given the rapid changes in telecommunications, the rich promises the future holds for increased consumer, economic and international competitiveness benefits, and the limitation of resources of time, energy and money, the Commission should now recognize that BPP is a policy whose time will never come and the justification for which can never be made.

Respectfully submitted,

COMMUNICATION TELESYSTEMS
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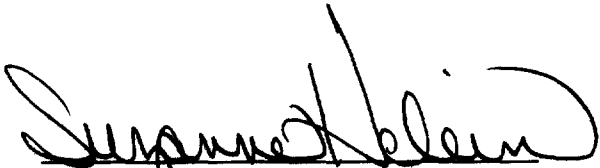
CERTIFICATE OF SERVICE

I, Suzanne Helein, a secretary in the law offices of Helein & Waysdorf, P.C., do hereby state and affirm that copies of the "Responsive Comments of Communication Telesystems International," in CC Docket 92-77, were served via hand delivery, this 14th day of September, 1994, on the following:

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